

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re: THOMAS BENEDICT LAMPRON , aka	>:	Chapter 13
Thomas B. Lampron, aka Thomas Lampron,	:	Case No. 5:17-bk-03429
Debtor.	:	

PENNSTAR BANK , a divison of NBT Bank, N.A.,	:	
(alternatively CNB REALTY TRUST)	:	
Movant,	:	Motion for
v.	:	Relief from Stay
THOMAS BENEDICT LAMPRON ,	:	
CATHY B. LAMPRON and	:	
CHARLES J. DEHART, III , Trustee,	:	
Respondents.	:	

**ANSWER TO MOTION OF
JPMORGAN CHASE BANK FOR RELIEF FROM STAY**

AND NOW COMES Debtor **THOMAS BENEDICT LAMPRON**, by and through his attorneys, **NEWMAN, WILLIAMS, MISHKIN, CORVELEYN, WOLFE & FARERI, P.C.**, and in Answer to the Motion of **PENNSTAR BANK** for Relief from Stay avers:

1. Denied. Debtor lacks sufficient information to form a belief as to the averments of paragraph 1 and such are therefore Denied.

2-8. Admitted.

9. Denied to the extent the averments of paragraph 8 are other than a statement or conclusion of law or request for relief that does not require a response.

10. Admitted.

11. Denied to the extent the documents referenced do not speak for themselves.

12. Admitted.

13. Denied to the extent the documents referenced do not speak for themselves.

14. Admitted in part and Denied in part. The property is now know as 196 Sweetwater Lane, East Stroudsburg, PA 18302.

15-17. Denied to the extent the documents referenced do not speak for themselves.

18 -19. Admitted.

20. Denied. Movant fails to credit Debtor for a least one payment in the amount of \$1,700 made on or about May 9, 2018.

21. Denied. See response to paragraph 20, above.

22. Admitted. This payment was not credited to Debtor on the payment history filed with the Motion.

23 -24. Admitted.

25. Denied. See responses to paragraphs 20 and 22, above.

26. Denied. See responses to paragraphs 20 and 22, above.

27. Denied. Debtor reasonably believe there may be equity in the property.

28. Denied. See response to paragraph 27.

29. Denied to the extent the averments of paragraph 29 are other than a statement or conclusion of law or request for relief that does not require a response.

30. Denied to the extent the averments of paragraph 30 are other than a statement or conclusion of law or request for relief that does not require a response. As Debtor's residence, the property is necessary for an effective reorganization.

31. Denied. CNB will not suffer irreparable harm.

32. Denied to the extent the documents referenced do not speak for themselves.

33. Denied to the extent the averments of paragraph 33 are other than a statement or conclusion of law or request for relief that does not require a response.

34. Denied to the extent the averments of paragraph 34 are other than a statement or conclusion of law or request for relief that does not require a response. As Debtor's residence, the property is necessary for an effective reorganization.

35. Denied. CNB will not suffer irreparable harm.

WHEREFORE, Debtor **THOMAS BENEDICT LAMPRON** respectfully prays this Honorable Court for an Order that the Motion of **PENNSTAR BANK** for Relief from Stay be Denied, or, in the alternative, an Order Conditioning the Automatic Stay on future monthly payments to cure any postpetition default, and for such other and further relief as the Honorable Court deems just and appropriate.

NEWMAN, WILLIAMS, MISHKIN,
CORVELEYN, WOLFE & FARERI, P.C.

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